

1 KATHLEEN BLISS, ESQ. (NV Bar #7606)
Email: kb@kathleenblisslaw.com
2 KATHLEEN BLISS LAW, PLLC
1070 West Horizon Ridge Parkway
3 Suite 202
Henderson, Nevada 89012
4 Telephone: (702) 463-9074
-and-
5 PAUL S. PADDA, ESQ. (NV Bar #10417)
Email: psp@paulpaddalaw.com
6 DAVID J. STANDER, ESQ. (Admitted PHV)
Email: dstanderlaw@gmail.com
7 PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard
8 Suite 300
Las Vegas, Nevada 89103
9 Telephone: (702) 366-1888
Fax: (702) 366-1940
10 -and-
DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)
11 Email: dmitchell@jenner.com
JENNER & BLOCK LLP
12 1099 New York Avenue, N.W.
Suite 900
13 Washington, DC 20001-4412
Telephone: (202) 639-6090
14 Facsimile: (202) 639-6066

15 Attorneys for Plaintiff

16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA
18

19 NAVAJO HEALTH FOUNDATION - SAGE
20 MEMORIAL HOSPITAL, INC. (doing business as
"Sage Memorial Hospital"), an Arizona non-profit
21 corporation,

22 Plaintiff,

23 vs.

24 RAZAGHI DEVELOPMENT COMPANY, LLC
(doing business as "Razaghi Healthcare"), a Nevada
25 limited liability company; AHMAD R. RAZAGHI,
individually; TAUSIF HASAN, individually;
26 DOES 1-20; DOES A-Z,

27 Defendant.
28

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO FILE
AMENDED COMPLAINT**

(THIRD REQUEST)

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7-2, Plaintiff Navajo Health Foundation - Sage Memorial Hospital, Inc. ("Sage Memorial") and Defendants Razaghi Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively, "Razaghi Defendants") stipulate and agree to extend the time for Sage Memorial to file its Amended Complaint for seven days, from May 21, 2021 to May 28, 2021. This is the third request to extend the time to file Sage Memorial's amended complaint. On March 15, 2021, the Court entered an Order permitting Sage Memorial to file an amended complaint curing deficiencies identified in the Order. ECF No. 128 at 34. As a result, Sage Memorial's amended complaint was initially due to be filed on April 5, 2021. On April 1, 2021, the Court granted the parties' first stipulation to extend the time for Sage Memorial to file its amended complaint until May 5, 2021. ECF No. 131. On May 3, 2021, the Court granted the parties second stipulation to extend the time for Sage Memorial to file its amended complaint until May 21, 2021. ECF No. 133.

Additional time to file the amended complaint has now become necessary for the following reasons:

1. As explained in the parties May 2, 2021 stipulation, ECF No. 132, the undersigned counsel for Sage Memorial is primarily responsible for drafting Sage Memorial's amended complaint. He is also counsel for plaintiffs ("9/11 Families") who hold a multi-billion dollar judgment against the Islamic Republic of Iran and certain of its political subdivisions and its agencies and instrumentalities arising out of Iran's material support for the September 11, 2001 terrorist attacks.

2. As also explained in the same stipulation, counsel for Sage Memorial is currently involved in representing the 9/11 Families in a judgment enforcement proceeding in Luxembourg against Iran and was in the process of reviewing approximately five hundred mostly single-spaced pages of briefs and expert reports that were being prepared for filing at the Luxembourg Court of Appeals.

1 3. Counsel for Sage Memorial is also involved in representing the 9/11 Families in a
2 judgment enforcement proceeding in Rome, Italy. The proceeding is currently pending before the
3 Italian Court of Cassation, which is analogous to the United States Supreme Court.

4 4. After the parties submitted their May 2, 2021 stipulation, a deadline was set for the
5 9/11 Families to file a brief at the Italian Court of Cassation. The deadline was set for May 21,
6 2021, the same date as the previously stipulated May 21, 2021 date for filing Sage Memorial's
7 amended complaint.
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9 5. Though counsel for Sage Memorial has attempted to complete work on both the Sage
10 Memorial amended complaint and the brief that must be filed with the Italian Court of Cassation
11 on the same day, counsel for Sage Memorial has determined that he will need additional time to
12 file Sage Memorial's amended complaint.

13 6. The additional time requested in this Stipulation will provide counsel for Sage
14 Memorial with sufficient time to complete the work necessary to file the brief with the Italian
15 Court of Cassation and then complete the amended complaint in this case.
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17 7. Counsel for Sage Memorial will not need, and will not seek, another extension of time
18 to file the amended complaint.

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1 8. The Razaghi Defendants consent to the extension requested by Sage Memorial to file
2 its amended complaint.

3 For the reasons set forth above, the parties ask the Court to approve the stipulation to extend
4 the time for Sage Memorial to file its amended complaint to May 28, 2021.

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6
7 /s/ Kris Leonhardt
8 Pavneet S. Upaal
9 Kris Leonhardt
10 Brian L. Bradford

11 Counsel for Razaghi Development
12 Company, LLC, Ahmad Razaghi,
13 And Tausif Hasan, *Defendants*

14 Dated: May 20, 2021

7 /s/ Douglass A. Mitchell
Kathleen Bliss
Paul S. Padda
David Stander
Douglass A. Mitchell

Navajo Health Foundation – Sage Memorial
Hospital, Inc., *Plaintiff*

Dated: May 20, 2021

15 IT IS SO ORDERED:

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17 DAYNA J. ZOUCHEK
18 UNITED STATES MAGISTRATE JUDGE

19 Dated: May 21, 2021
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